

I. IDENTIFYING INFORMATION

**GOVERNOR'S COORDINATION AND
SPECIAL SERVICES PLAN**

State/Commonwealth of

MISSOURI

for the period

Program Years 1996 and 1997

NAME OF GRANTEE:	The Honorable Mel Carnahan
ADDRESS OF GRANTEE:	State Capitol, Jefferson City
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II. PROGRAM PLANNING INFORMATION

A.1. through A.4 Governor's Goals and Objectives

To prosper in the global economy of the 1990's and beyond, Missouri must alter its approach to workforce development. The State has continued to validate its belief that employers will support a training system which recognizes the need for a work force that has received the added value of quality education and training. At the same time, the transformation of Missouri's workforce development programs must parallel the focus on quality mandated by the Governor's economic development strategy. Many of the goals expressed in the Statewide Training and Employment Implementation Plan recommended by MTEC and accepted by the Governor in 1995 are being implemented and reflected in the Governor's economic development strategy.

The Governor has recognized that success can only be accomplished by encouraging shared ownership, cooperation and accountability among the various partners in the workforce development system. The changes he proposes in his economic development policy include:

- shared and local focus of economic development strategies;
- establishment of regional offices;
- targeted economic development assistance to encourage innovation and expansion of "high" technology firms; and
- refocused programs to help Missouri's small businesses grow and create new jobs, including entrepreneurial support. These objectives parallel changes Congress supports in its workforce block grant strategies.

In May 1995, an interagency team from the Departments of Economic Development, Labor and Industrial Relations, Elementary and Secondary Education, Social Services, and Higher Education developed a grant application to fund a statewide One-Stop Career Center System.

The One-Stop Career Center System not only encompasses the U.S. Department of Labor employment and training programs, but will be integrated with broad educational and social service systems. Four broad outcome objectives of the One-Stop System are:

- Universality - everyone in need of labor market workforce development information will have access to widely available basic services.

- Choice - customers will have a variety of ways to obtain quality information on education and training for informed decision making.
- Integration - ready access to a wide array of services and information for customers.
- Accountability - performance driven outcome measures and consequences for failing to meet those objectives will drive the system based on customer satisfaction and continuous improvement.

These goals and objectives for workforce development in Missouri have guided the development of the Governor's Coordination and Special Services Plan for PY'96-97. They provide direction for the use of scarce job training resources and their linkage with the proposed economic development strategies. They are the Governor's priorities for the workforce development system and describe the direction in which the system should move as it strives to meet the needs of customers in a rapidly changing economy.

Provide Opportunity and Ensure Economic Growth

Increasing Missouri's economic potential requires a strong coordinated approach to economic development. In turn, effective economic development necessitates diverse yet interrelated efforts to assist employers. Such efforts may include assisting new companies locating to Missouri, supporting existing businesses with expansion efforts, or assisting employers in finding employees with the needed capacity for the job.

Missouri is integrating state and local partnerships that incorporate four overarching strategies for achieving success in this time of change:

- accountability for achieving results;
- bringing services closer to the customer;
- insuring active community involvement in planning and decision making to meet the workforce development needs of the community; and
- flexible, efficient, and effective use of funds to meet state and local needs.

In addition, the State's comprehensive economic development strategy has taken into consideration the MTEC Statewide Training and Employment Implementation Plan, Employment Security Revitalization Plan, School-to-Work Planning Grant, One-Stop Implementation Grant, and the Quality Economic Development initiative. The following objectives incorporate the goals and recommendations of these initiatives.

- Expand a coordinated marketing program that clearly communicates to employers and the public the availability and capability of job training and economic development resources in Missouri.
- Increase the efficiency of delivering training for potential employees of new or expanding businesses and, when necessary, within the parameters of an amended JTPA, provide retraining, upgrade training, and entrepreneurial training to support new capital investments of existing businesses through both state and federal resources.
- Using strategies developed by the State Workforce Preparation Task Force, promote and encourage employers to define the necessary work place skills required of their workers so that appropriate training programs can be developed and delivered.
- Provide continued support to ensure a comprehensive, coordinated public labor exchange to meet customers' needs.
- Promote and support continuing improvements in Missouri's labor market information system to meet customer needs -- employers, students, and job seekers.
- Promote the distribution of needed-skills information to entities in the workforce development delivery system for the purpose of facilitating necessary changes in the design and development of training programs.
- Promote and encourage further opportunities for "open entry, open exit" programs for specific occupational training.

Equip Missourians With Basic Skills to Enhance Their Potential for Employment and Life-Long Learning

An educated citizenry is Missouri's greatest asset as we move into the 21st century. Missourians must be proficient in the basic skills necessary for self-sufficiency and should be offered a system capable of transferring such skills directly to an occupation or additional training. Training and occupational education are essential for individuals wanting to develop or expand their work skills and thus increase their long-time opportunities in the job market. This compliments the philosophy in the Secretary's Commission on Achieving Necessary Skills (SCANS) report. Moreover, this goal readies the state in preparation for the accommodation of national programs integrating federal labor and educational initiatives emphasizing the transition from school-to-work.

Meeting the objectives below will help Missourians achieve their maximum individual employment and career path potential while building a foundation for life-long learning.

- Continue to support and promote the development of "no wrong door" service models wherever locally desired to accommodate ease of access to workforce preparation, education, and training opportunities.
- Provide access to and acquisition of basic literacy skills particularly when such programs enhance education and training tailored for the work place.
- Improve and promote economic diversification through the use of skill adjustment strategies for workers displaced by such change as Department of Defense reductions impacting Missouri military or defense industry contractors, high technology deployment or plant closings.
- Provide the coordinated means for welfare families, particularly FUTURES participants, to gain knowledge and job skills necessary to become economically independent.
- Ensure training opportunities and support services are developed which enable targeted populations including the homeless and veterans to effectively participate in Missouri's workforce.
- Cooperate with Private Industry Councils (PICs) and other state agencies to promote, develop, and/or strengthen local and state programs to ensure training opportunities are developed which enable targeted populations -- including the homeless, veterans and women choosing nontraditional occupations or apprenticeships -- to participate in Missouri's workforce.
- Continue to implement public/private initiatives to address the remedial and basic education needs of, as well as opportunities to gain work experience for, at-risk youth and dropouts.
- Aggressively solicit, encourage and utilize employer input to complement available labor market information and to plan education and training programs.
- Promote the development of integrated school-to-work transition and/or youth apprenticeship programs and models as part of local workforce development activities/system.

- Develop and promote incentives to encourage public and private sector employers to increase the skill level of Missouri's workforce by providing continuous employee training.

Expand the Capacity of Missouri's Job Training Program to Deliver More Efficient and Effective Services To Customers

Missouri's workforce development system is composed of economic development, education, training, and placement agencies from five departments of state government which administer a wide variety of federal, state, and local educational and training programs. In addition, a number of agencies, including not-for-profit agencies, provide supportive services to training program participants and use the workforce development system to provide services to their customers.

Clearly, these agencies and other statewide organizations such as the Missouri Organization of Private Industry Council Chairpersons, Training and Employment Administrators of Missouri, and various councils and associations involved with vocational education, community action, child care, and women's economic development must work together with the private sector to ensure quality and effective services to customers. The One-Stop Career Center can serve as the organizing vehicle to transform the hundreds of employment and training programs into a coordinated, high quality information and service delivery system. School-to-Work offers a framework for redesigning learning experiences for in-school and out-of-school youth by integrating both school-based and work-based learning, and connecting activities that link the two together. By meeting the objectives outlined below, Missouri can improve the operation and delivery of job training programs and services for its many customers.

- Encourage increased involvement of the private sector in forming cooperative partnerships to design and develop local job training programs which meet local employment and customer needs.
- Develop and promote the technical capacity of professional staff members to ensure a high quality of service and customer focus.
- Support joint job training projects among related state agencies and initiate additional projects which meet the Governor's goals and coordination efforts.
- Support community partnerships between state and local governments, service agencies, business, labor, and civic leaders which develop and implement a coordinated strategy to identify and meet employers' requirements of the future work force.

- Encourage cooperative use of workforce development funds, facilities, and staff resources for a more comprehensive, coordinated, and efficient statewide system.
- Facilitate the coordination of public employment and training policy development, public awareness of the policies and maximum utilization of the public and private employment and training resources in Missouri.
- Pursue state and federal legislative initiatives which accommodate the changing needs of the workforce development system, especially those anticipated for potentially changing state administrative structures, establishing comprehensive systems and implementing state and national policies and program objectives to better serve the customer.

Nontraditional Training and Placement for Women

The Division of Job Development and Training will continue to cooperate with PICs and other state agencies, including the Women's Council, to promote, develop and strengthen local and state programs to serve the employment and training needs of women in nontraditional employment and apprenticeships.

Each local Job Training Plan for PY'96-97 contains goals and descriptions of local efforts to promote training and employment opportunities for women in nontraditional employment areas. While no numerical state minimum has been established for the participation in nontraditional training for women, there has been a steady increase in nontraditional training and placement for women since the amendment was made to the JTPA law in December 1991. In PY'92, its first full year of implementation, 42 women were trained and this increased to 216 women by PY'94. Despite budget cuts in PY'96, there will be an increase of 3% in the number of women who will participate in Title II funded nontraditional training. Plans are to continue the outreach and educational efforts to participants, employers, and the workforce development system in general. The state continues to work with and support the Missouri Occupational Information Coordinating Committee in providing regular updates on occupational information to state and local agencies specific to nontraditional occupations for women.

Coordination and utilization of existing statewide program efforts through Carl D. Perkins Vocational and Applied Technology Education Act continues to be pursued. The Coordinator of the Sex Equity Program under Carl D. Perkins Vocational and Applied Technology Education Act regularly shares information with MTEC and the local and state workforce development partners.

Two of the Carl Perkins Sex Equity Programs used by the SDAs are Project ENTER, a public relations and support service for participants and educators in nontraditional vocational education training programs and CHANGING CHANNELS, a satellite program designed to recruit women into the technologies and occupations nontraditional for females. At the local level, regional and district sex equity coordinators plan and implement exploratory activities in the form of workshops, hands-on activities, exploratory sessions, role modeling, and mentoring services to women interested in the nontraditional vocational education training programs. These programs will continue to be coordinated to benefit local women in need of services from the vocational education and workforce development community.

The recently completed U.S. Department of Labor demonstration grant awarded to Missouri in December 1993 enhanced the nontraditional employment and training opportunities for women.

The Missouri grant was a joint collaboration of the Missouri Women's Council, the Missouri Division of Job Development and Training, the Full Employment Council, Inc. Kansas City, and the Job Council of the Ozarks, Springfield. The grant was designed to provide a SDA generated awareness program to encourage community support for nontraditional employment opportunities for women.

The long-range goal of this joint collaboration was to institutionalize changes at local and state levels to provide and enhance opportunities for women to achieve their full potential through training and employment opportunities which are nontraditional, high demand, and high paying.

The statewide changes in the delivery of training and employment for women, promoted by the grant's objectives, included:

- Promoting awareness of nontraditional employment opportunities among all segments of the community.
- Increasing the number of women entering nontraditional occupations.
- Increasing the opportunity for higher wages at placement for women.
- Reducing the number of women and children living in poverty as nontraditional employment offers higher wages, benefits, and advancement.
- Using human service agencies' resources more efficiently through partnership, coordination, and collaboration.

- Training a skilled, gender-neutral work force for employers.
- Reducing dependency on public assistance.

With support of the collaborating agencies, the grant produced and distributed several model programs to improve training and employment opportunities for women in nontraditional occupations. These models can be replicated and customized to meet local needs. The models also include the development of a "How to" manual on mobilizing community resources and an expanded intake/assessment system.

Town Hall meetings were held throughout the state to provide a forum for women to discuss issues and problems related to work and family. The meetings were supported by state and local regional resources and private sector contributions.

The Division of Job Development and Training and the Missouri Women's Council work cooperatively to focus attention on women's employment and training needs, including nontraditional occupations. Even with diminishing resources, the Women's Council, through a JTPA 8% contract with DESE, plans in PY'96 to build on the previous year's projects to provide women with basic skills training in math, communications, and reading in preparation for enrollment in full-time skill training in nontraditional occupations. Projected participant outcomes include increased levels of basic skill competencies, enrollment in a nontraditional skill training program, and successful placement into the nontraditional workforce upon completion of training.

The Women's Success Center provides the structural framework for: a strong system of support from peers and mentors; a college preparatory semester; the development of individual portfolios; two to four semesters of career skills acquisition or enhancement; and finally, a capstone seminar which is modeled after the leadership training courses offered by Chambers of Commerce nationally.

The video entitled "Mentoring: Achieving Potential" was produced by a consortium of 11 educational institutions. The video captured the collective wisdom of mentors and student proteges. The mentors and students shared their experiences and encouraged others to participate in mentoring programs. The video was distributed to agencies whose clientele could benefit from mentoring opportunities, particularly women engaged in nontraditional training or jobs.

Anti-Drug Assurance

The state assures its adherence to the Anti-Drug Abuse Act of 1986. See Exhibit I.

Private Industry Council Oversight

Each SDA has written a substate monitoring plan in accordance with standards developed by the state. The state's standards require the SDA/SSG to operate local oversight systems to review both compliance and quality issues. The Division will monitor each SDA/SSG's implementation of their substate plan to determine if it is in compliance with all applicable laws. If an SDA's monitoring is sufficient, then the state will focus its oversight efforts in a qualitative review of programmatic areas. It is envisioned that this monitoring approach will enable the state to determine weak programmatic areas, and promote the use of continuous improvement processes to improve quality of services and customer satisfaction. See Attachment D for details of the substate monitoring plan minimum standards.

B.1 through B.6 Coordination

The Governor recognizes the diversity of agencies and programs which constitute workforce development services in Missouri. Changing demographics, economic conditions, and a focus on the delivery of quality services to customers require that Missouri blend diverse but related service delivery systems into the most effective and efficient workforce development system possible. This focus stems from an amended federal law and the Governor's economic development strategies, both of which steer the system toward collaborative changes for quality and accountability.

Passage of HCS/HBs 294 and 405 in the Spring of 1991, which established the Missouri Training and Employment Council (MTEC), has strengthened coordination and collaboration of this diverse system. The Council is charged with federally mandated duties of the State Job Training Coordinating Council, as well as a mandate to recommend a policy, and subsequently a plan, to address three (3) major areas:

1. Public and private participation toward achieving Missouri's objective of full employment;
2. Methods to improve federal and state resources in providing job training services; and

3. Coordination of training and employment activities with other related activities.

To address these goals, MTEC formulated a statewide training and employment policy in 1992 which guided the development of a training and employment plan which was completed in December 1993. The Governor endorsed the plan and issued Executive Order 95-11 in May, 1995 to establish an interagency team representing the Departments of Economic Development, Elementary and Secondary Education, Higher Education, Labor and Industrial Relations, and Social Services to implement the statewide workforce development plan based upon the recommendations of the Missouri Training and Employment Council (MTEC).

The greatest challenge of the Missouri Training and Employment Council will be to develop strategies to further strengthen the system by establishing a greater level of coordination among the many public and private workforce development partners.

To promote and facilitate continued collaboration among agencies within the workforce development system at the state and local levels, the Coordination Criteria for PY'96-97 are:

1. Use of successful models from Missouri and other states, local Private Industry Councils (PICS) to explore the initiatives, programs and processes used to collaborate in establishing community partnerships. These partnerships will enhance coordination and eventually, when fully developed, lead to the provision of more accessible, customer friendly employment and training services.
2. Local PICs, using the technical and financial assistance made available to them, will explore and move to implement, where feasible, school-to-work and/or apprenticeship models in collaboration with education agencies.
3. State agencies will promote the use of common assessment and screening factors within the employment and training system for use at the local level.
4. State and local training and employment agencies will promote curriculum development and the linkage of programs that more clearly tie education and training systems to the world of work.
5. State agencies will continue to investigate the potential for mutual sharing of pertinent training-related information for use at the state and local level. The initial emphasis for sharing will be to track participants

across programs, to evaluate programs, to develop participant profiles and to prepare reports. If necessary, state agencies will actively pursue clarification and interpretation at the federal level.

6. Collaboration at the local level among the various agencies identified in the local coordination plans will be continued. In PY'96-97, the PICs will be encouraged to expand the use of resources (linkages) potentially available from other state and federal programs. These programs will include those from the following federal laws: Carl Perkins; Wagner-Peyser; Job Opportunities and Basic Skills (Missouri FUTURES); Adult Education Act; Food Stamp Act; National Apprenticeship Act; Rehabilitation Act; Older Americans Act; Trade Act; Stewart B. McKinney Homeless Assistance Act; United States Housing Act; National Literacy Act; Head Start Act; Elementary and Secondary Education Act; Individuals with Disabilities Education Act; and JTPA to support local programs in an integrated approach for delivery of services to clients to include special populations such as the disabled, single parents, welfare recipients and offenders.

Partnerships between state and local agencies are focusing on new joint programs and new lines of communication. The most significant and lasting partnership has been the voluntary cooperation of local agencies to provide services because of mutual interests and customers. JTPA provides the legal authority to bring together public and private agencies and employers to influence service delivery in their regions. Executive Order 95-11 strengthens the cooperation of the major stakeholders in the workforce development system and is helping to encourage and expand the partnerships to achieve better services to customers.

Education

Shrinking resources have reinforced the need to avoid duplication of services--but increased customer demands are calling for an expanded range of services. The cooperative efforts established over time with many of the service and training agencies, particularly those programs funded under the Carl D. Perkins Act and the Adult Education Act, are helping to provide the training and basic skill needs of the customers.

The Division encourages, assists, and monitors the activities of each SDA to increase cooperation and planning with all educational agencies and local educational advisory groups. The Division will continue to encourage the need for educational representation on local private industry councils and advisory groups.

This mutual representation at the local and state levels serves as a means of quick communication understanding of the operational training activities with regard to customer's needs. The One-Stop Career Center system will provide the means to integrate school-to-work and workforce development.

Missouri's School-to-Work system is designed to give local partnerships as much flexibility as possible, while providing the necessary state-level guidance and assistance. The Division is a member of the State Planning Team. Currently, Missouri is stimulating and supporting School-to-Work through fifteen regional partnerships that received grants in 1994 to conduct awareness and planning activities. Each regional partnership cataloged existing School-to-Work activities and conducted focus groups for each major stakeholder group-- employers, educators, parents, and students-- to determine their attitudes and expectations. This information has been reported and is being used both at the regional and state level to ensure a coordinated, efficient School-to-Work system which serves all students.

In addition to planning grants, three local partnerships received pilot grants to develop and implement School-to-Work systems which could be replicated in other areas of the state. The Columbia Public Schools' pilot focuses on grades 6-12 to develop career and classroom materials around six career paths. Columbia's School-to-Work Partnership, in collaboration with the Columbia Chamber of Commerce recently received a Federal/Local School-to-Work grant to further their career path development partnership model. Farmington Public Schools pilot includes job shadowing, mentoring, and career days beginning at the elementary level. At the secondary level, the majority of students are given the opportunity to obtain work-based experience. State Fair Community College's pilot promotes partnership among businesses and schools including coordination of career awareness activities in high school and middle school. In addition, articulation agreements have been developed and are being enhanced through a strong base of experience with Technical Preparation

The Division funded a pilot initiative in five sites to link the school-based and work-based activities through a coordinator. The Employer Gateway project has provided a conduit for the exchange of information between the academic training and the needs of employers.

Missouri will continue to use a state-directed, locally driven roll out strategy to implement its School-to-Work Opportunities system.

Cooperative efforts will continue between JDT and the Department of Elementary and Secondary Education, which is responsible for the state administration of both the Carl D. Perkins Act and the Adult Education Act of 1965; Private Industry Councils within the JTPA SDAs; and the Missouri Training and Employment Council through the following efforts:

1. Cooperative use of the Missouri vocational education delivery system, including comprehensive high schools, area vocational schools, community colleges, and state colleges and universities; as a primary mechanism to deliver instructional programs throughout the state.
2. Continued development of a cooperative approach to technical assistance which will be mutually beneficial to strengthen the statewide delivery of occupational and basic education training.
3. Cooperatively sharing operational plans at the state and local area levels to better coordinate statewide delivery of occupational and basic education training for customers.
4. Meet at least annually at the state and at each local level to address common problems in the employment and training field and to develop strategies for economic development, basic education, occupational training, and other areas of mutual concern.
5. Cooperative use of labor market information through the Missouri Occupational Information Coordinating Committee to facilitate planning and delivery of specific occupational training throughout Missouri.

Multiple meetings of staff members responsible for the administration and implementation of the respective Acts are held to discuss specific strategies for improved coordination, implementation, and planning. This coordination provides the mechanism to continually improve occupational training opportunities for all citizens of Missouri.

Job Opportunities and Basic Skills Training

The Missouri Job Opportunities and Basic Skills Training (JOBS) program, known as FUTURES, is fully implemented. The state Departments of Social Services, Labor and Industrial Relations, Education, and Economic Development are charged by State Statute (RSMo, 1989 - 208.405) to avoid duplication, by making the best use of existing systems and funding resources to maximize the effectiveness of the JOBS program in Missouri.

The workforce development system is actively involved in the provision of occupational skill training and on-the-job training and assessment services to compliment initial assessments made by the FUTURES case managers and other appropriate services to aid AFDC participants reach their career goals as defined in their self-sufficiency pact.

The Directors of these departments have met to discuss pending policy and procedural concerns. Additionally, there are several joint contractual agreements to provide additional case management services, individual classroom referrals, and other job readiness and placement services. These contracts link several funding sources including FUTURES, JTPA, Wagner-Peyser, Adult Basic Education, Carl Perkins, and private funding. Some areas have co-located staff and services. The One-Stop Career Center Implementation Grant and the MTEC Employment and Training Plan enhance and strengthen the streamlining of services to mutual customers.

The Missouri Training and Employment Council (MTEC) biannually reviews the initially submitted JOBS State Plan and any amendments.

During the implementation phases of FUTURES, the Council received updates from the state director of the program. Now that FUTURES is implemented statewide, the Council has placed a report on the status of FUTURES graduates as a permanent annual agenda item.

Approximately four years ago, the Division of Job Development and Training (JDT) and the Division of Family Services (DFS) entered into an agreement for a "view only" on-line system enabling SDA staff to access specific FUTURES and Income Maintenance data screens. This information can be used to document the eligibility status of an AFDC and/or Food Stamp recipient and the individual's status in the FUTURES program. This system is available in all 15 SDAs. It has expedited routine eligibility verification as well as enhanced the efficiency of service to the customer.

In several areas around the state, pilot projects involving the FUTURES program, education, training, social services agencies, and the private sector, are in various stages of development and/or implementation to provide education and training services and ultimately employment to individuals served by DFS. Some of the pilot projects include::

- an on-the-job training program with an employer where the welfare grant is diverted to subsidize a portion of the participant/employee's wage;
- a project to provide education, training, and employment to noncustodial parents of AFDC children in order for them to financially support the children; and

- state cabinet level meetings of the agencies that deliver human services, education, employment, and training programs to discuss ongoing and future projects.

Child Care

The increased demand on limited JTPA funds for training and supportive services, including follow-up services to help former participants retain employment, the state and local workforce development agencies have increased their search for additional resources. Child care continues to be a primary and costly need of many customers served by JTPA.

Subsidized child care under the Child Care and Development Block Grant Act of 1990, and expansion of the Head Start programs, are helping the state meet child care needs and provide health information and crisis assistance for the entire family. Increased involvement with DFS and the FUTURES program has made this resource available to all the SDAs.

At the state level, the enactment of the Child Care Development Block Grant of 1990 resulted in a change in the responsibility for administration from one state agency to another and the establishment of an advisory committee of child care providers, educators, and users. The Division is a member of that advisory board.

At-Risk Youth and Literacy Services

Missouri continues to address the needs of at-risk youth through local SDA funds, Department of Elementary and Secondary 8% education and coordination grant and school-to-work projects. Initially, literacy services for youth were provided as a pilot project through JTPA 8% funds. At its peak in PY'91, there were 21 Centers for At-Risk Youth which covered most of the state. These projects provided services to school dropouts and at risk youth with remedial and basic education deficiencies who were economically or academically disadvantaged. Generally, the program was provided to an eighth grade student. A dropout could enter at any time and either select to obtain a GED certificate or reenter high school. Often, a six-week summer remedial education program was available for those eighth graders who needed the services.

Beginning with the ninth grade, students could be placed in basic skills classes which included: language arts/ communication skills, social studies, science, mathematics, and fine arts.

For a high school student who could not earn enough high school credits to graduate with their graduating class, the project emphasis shifted toward attainment of a GED certificate. An eleventh grade student was referred to the appropriate occupational education program. These programs have proved so successful in reducing dropouts, many of their components have been assimilated into the general curriculum of the public school system and serve as a model for the school-to-work projects.

Currently, funding comes from Carl D. Perkins funds, state vocational education, Adult Basic Education (ABE), Average Daily Attendance (ADA), JTPA 8% funds, local funds, in-kind contributions, and local JTPA Title II-A, Title II-C, and Title II-B.

In the fall of 1993, the U.S. Departments of Labor and Education through the School-to-Work Opportunities Act of 1993, made planning grants available to states to begin the process of designing a state school-to-work system.

As previously mentioned, Missouri received a planning grant of \$290,000 in January 1994. A Governor's Task Force was appointed to advise in the development of a statewide school-to-work system for the youth of Missouri. Five state agencies, including the Coordinating Board for Higher Education (CBHE); the Department of Economic Development (DED); the Department of Elementary and Secondary Education (DESE); the Division of Family Services (DFS); and the Department of Labor and Industrial Relations (DOLIR), are currently collaborating in this important initiative. The goal is to establish a comprehensive and effective school-to-work system that offers young Missourians the opportunity to participate in high-quality, performance-based programs resulting in a high school diploma, a degree or diploma certifying successful completion of at least one year of post-secondary education, and an industry-recognized skill certificate.

State Allocation Procedures

The state substate allocation systems are described in Attachment B and within the appropriate funding program description.

III. PROGRAM ACTIVITIES

Evaluation

During PY'94, 6,727 participants were served in Title II-A and 4,207 were served in Title II-C training programs statewide. Of those completing 46% of the Title II-A and 42% of the Title II-C entered employment.

SDA performance for PY'94 was evaluated using the Secretary of Labor's performance standards model which uses the thirteen week follow-up data for adults. Statewide, the SDAs' adult measures were the actual follow-up employment rate of 68% and the actual follow-up weekly earnings of \$267. The actual follow-up welfare weekly earnings was \$248 and the actual 13 week follow-up welfare entered employment rate equaled 61%. Statewide, the SDAs' actual youth entered employment rate was 53%; and the actual youth employability enhancement rate was 67%.

The Experienced Worker Program provided job training to 569 economically disadvantaged individuals aged 55 and over during PY'94. Sixty-seven percent (67%) of the participants who completed the program entered employment.

In the first half of PY'95 (through December 31, 1995), 4,125 participants were served in Title II-A and 1,864 were served in Title II-C training programs statewide. Of those who participated, 45% of the Title II-A and 40% of the Title II-C entered employment.

SDA performance for the first half of PY'95 was evaluated using the Secretary of Labor's performance standards model. Statewide, the SDAs' adult measures were the actual follow-up employment rate of 68% and the actual follow-up weekly earnings of \$276. The actual follow-up welfare weekly earnings was \$261 and the actual follow-up welfare entered employment rate equaled 62%. Statewide, the SDAs' actual youth entered employment rate was 54%; and the actual youth employability enhancement rate was 54%.

The Experienced Worker Program provided job training to 323 economically disadvantaged individuals aged 55 and over during the first half of PY'95. Sixty percent (60%) of the participants who completed the program entered employment.

With approximately 848,000 economically disadvantaged persons eligible for JTPA programs, Missouri's potential demand for job training far exceeds the supply of services. These limited job training resources must be used in the most efficient and cost-effective manner to increase employment, training, and placement opportunities for customers. By coordinating the planning, design,

and delivery of job training with other related public and private activities, the programs and services benefited more Missourians than would have otherwise been possible. The implementation of the One-Stop grant will strengthen the coordination and provide optimal services to all customers.

The following description of the monitoring process summarizes how SDAs' performance is monitored and the corrective action process for programs. Under-expenditure is monitored and the deobligation/reobligation policy is explained in Attachment A.

Projected Use of Funds

The state of Missouri will conduct on-site compliance or quality control monitoring of all SDA Title II programs to determine their compliance with JTPA, state established fiscal policies and procedures, related applicable laws and regulations, and the local Job Training Plans. The substate monitoring will include a determination of compliance to:

- training women in nontraditional employment;
- training-related placement of women in nontraditional employment and apprenticeships; and
- a description of efforts to be undertaken to accomplish the goals described above, including efforts to increase awareness of such training and placement opportunities.

Similarly, operators of Title II-A 8%, experienced worker, and other programs are monitored annually to ensure compliance and quality. The Division will also select potential problem areas for further, more in-depth review when appropriate. These reviews may consist of surveys, in-depth reviews of reporting, or more detailed on-site program reviews. Program quality reviews may be substituted, on an alternating year basis, for compliance reviews. In keeping with the outcome objectives of accountability and customer satisfaction, input will be sought and used for continuous improvement of the workforce development system.

Written reports will be issued after each monitoring with appropriate corrective action required within a 30-day period. On-site follow-up regarding the implementation of SDA corrective action will occur at a reasonable interval following the receipt of a corrective action plan, when required.

The state provides support to SDAs through various ongoing training and technical assistance activities. SDAs and individual program operators receive direct JDT on-site training and technical assistance, as needed, based on both on-site monitoring and desk review findings. These activities may be provided on an individual basis or through group sessions on a regional or statewide

scale. Additionally, training and technical assistance will be targeted to enhance participation and skill building of PICs as well as MTEC, particularly in the role of oversight and monitoring of programs in support of the overall goal to enhance the quality and efficiency of services to all customers.

In addition to the state's annual on-site monitoring of SDAs and state-funded programs, the Missouri Training and Employment Council also maintains an active role in the oversight of all JTPA-funded programs.

Over the past few years, MTEC has been building a more expansive relationship with the stakeholders and customers of an integrated workforce development system. In addition to oversight of the JTPA-funded programs, it has increasingly received information on emerging programs from other workforce development training and related services' providers.

The Council provides review and input into the state's JTPA incentive policy on at least an annual basis and becomes actively involved in the methodologies used to provide technical assistance and capacity building to program operators and SDAs in Missouri.

Administrative Activities

Administrative activities include planning and evaluation, program management, operations and monitoring, and fiscal management. JTPA funds will be used by the state for administrative activities and selected allowable activities under sections 121 and 122 of JTPA.

The Division assists SDAs with the development of local plans and evaluates program effectiveness for state and local programs. JDT also coordinates and updates statewide participant and financial management of program performance levels. A weekly statewide post program follow-up survey which includes all Title II-A adults and adult welfare termines is conducted 13 weeks after the participant's termination date.

Local SDA job training plans are evaluated by the state for compliance with state and federal law and certified for consistency with the Governor's Coordination and Special Services Plan. The state fulfills all federal reporting requirements on JTPA program performance and develops policy issuances and regulations for the implementation and operation of JTPA.

- The Division continues to review and refine its programmatic financial and administrative policies to provide greater integrity to the entire JTPA system without circumventing the local PICs' authority.

- The Division and/or the SDA monitors contractors and job sites for compliance with federal laws and regulations including compliance with procurement policies. The state also monitors planned versus actual performance to ensure that SDA contractors' performance demonstrates consistent progress.
- The Division ensures that the obligation and expenditure of JTPA funds and the use of property are in compliance with the requirements and conditions of JTPA grants. The state provides financial information to meet federal, state, and internal financial reporting requirements.
- Accounting records and documentation to identify and support expenditure of JTPA funds are also maintained. In addition, JDT will review independent audit reports of each recipient of JTPA funds for compliance with federal and state regulations. Procedures for deobligation of unspent funds and repayment of misspent funds are included in the fiscal management system.
- The Division's current Deobligation/Reobligation Guidelines was implemented on July 1, 1994. A copy of the Guidelines are included as Attachment A. The Guidelines cover Title II-A and Title II-C funds which are awarded to SDAs. All other Title II-A and Title II-C funds are contracted and monitored on an annual basis by the state agency.
- The Division will conduct selected activities under Section 121(c) of the JTPA as described in this plan. JDT provides staff support to the MTEC to assist the Council in carrying out its duties as described in the Act.

Training Activities Titles II-A, II-C, II-B

Resources available for PY'96 are approximately \$9,000,000 less than PY'95 for Title II-A, Title II-C, and Title II-B. SDAs in Missouri will use JTPA Title II-A, Title II-C, and Title II-B resources to provide a variety of job training activities in accordance with approved Job Training Plans. The Title II-A and Title II-C funds will primarily be used for assessment, counseling, case management, classroom occupational, and work experience activities. There will be some planned funding for educational activities, both basic skills and remedial, but with minimal increase over PY'95. The program offered to economically disadvantaged youth during the summer, using Title II-B funds, consists predominately of opportunities to gain work experience, some remedial and basic education, and basic life skills.

The reduced funding, particularly for youth, may cause the SDAs to decrease, or possibly eliminate the provision of long-term commitments to skill or on-the-job training. The result of such a reduction may be an increased emphasis on assessment, career guidance, and job search skills.

Participants' assessments are showing a need for a continuum of training and education activities and supportive services, particularly child care and needs-based payments, in order to assist the participant in becoming self-sufficient. This longer term commitment toward self-sufficiency by the participant has led to more intense JTPA case management.

Many of Missouri's 15 SDAs identified additional specific hard-to-serve barriers for Title II-A and Title II-C. These apply as appropriate to adult, in-school youth, and/or out-of-school youth. The Governor approved barriers include food stamp recipients, single parents with dependent children, family members in an AFDC or other public assistance household, displaced homemakers, and individuals who experience transportation problems which constitute a substantial barrier to employment.

Periodic reviews by JDT staff and MTEC of adult and youth program performance provide information for policy recommendations to strengthen the system and program design.

Experienced Worker Program

Missouri will continue in PY'96-97 to serve economically disadvantaged Missourians aged 55 and over through the Experienced Worker Program. The Division administers the Title II-A Experienced Worker Program (EWP) through contracts with local program operators who have demonstrated the capacity to manage quality employment and training programs. The Division provides overall program planning, administration, technical assistance, monitoring and evaluation.

In PY'96-97, Missouri will distribute approximately \$600,000 (excluding carryover funds) under the Title II-A set-aside to operate job training programs for experienced workers throughout Missouri. These funds will be used to train and employ economically disadvantaged individuals, 55 years of age and over, who have encountered barriers to employment. An individual eligible under Title V of the Older Americans Act will be deemed eligible under EWP, if there is a joint program agreement between the Title V and JTPA program operators. Also, up to 10% of the individuals who have a barrier and meet Title V eligibility could be served through EWP.

The Division will contract local EWP administration and delivery through the PIC or a PIC acceptable alternative EWP contractor. This approach should increase coordination with locally administered JTPA services, linking EWP to the SDA service delivery system.

Funds will be equitably distributed to contractors in all 15 SDAs based on an allocation method (see Attachment B for details). Each EWP contractor's responsibility will consist of, but not be limited to, the day to day operation and fiscal functions of the program as specified in JDT's contract agreement.

On-the-job training and job search assistance comprise the primary program activities for the EWP. On-the-job training may consist of either part-time or full-time training based on the needs of the experienced worker and the employer. Job search assistance is a group approach to teaching effective job search skills to the unemployed.

All program operators will offer participants a comprehensive mix of services, tailored to meet individual needs. Additional assistance available to program participants include: assessment of skills, personal development needs, identification of employment goals, vocational training, counseling and supportive services, and needs based payments if appropriate. Following the assessment, job development efforts will be directed to both full-time and part-time on-the-job training in the private sector. The Hospitality Host component which serves Missouri's growing tourism and service industries continues to expand the opportunities for EWP customers. Since part-time employment plays an important role in matching employers' needs with the needs of experienced workers, job development efforts will be specifically targeted to those employers using part-time positions. Industries and occupations projected to have the largest employment increases in the future are frequent users of part-time workers.

Vocational training will also be made available to experienced workers through a contract with DESE. The Division has set aside Title II-A EWP funds specifically for this purpose.

To assist EWP program operators in providing a mix of program services, JDT will place greater emphasis on the provision of technical assistance, training and program reviews. All EWP contractors will be required to meet performance standards criteria described in the performance standards methodology in Section IV of this plan. Additionally, JDT, with approval of MTEC, has established performance measures to ensure effective services to older individuals. EWP operators' performance will be regularly evaluated by JDT using a quarterly Performance Report.

The JTPA regulations' Section 628.320(a)(1), stipulates that the Governor consult with the appropriate Private Industry Councils and Chief Elected Officials prior to entering into service agreements to assure that the services provided are consistent with the program and activities in the SDAs.

Currently, the state contracts the experienced worker services authorized through JTPA using a single scope of work for all SDAs. Since the program is operated locally by SDAs, consultation with the SDAs is inherent in the contracting process. In addition, this contracting method ensures that services are consistently provided for all of the SDAs customers

In the event that services for experienced workers are provided under an agreement between the state and an agency other than the Administrative Entity in the SDA, the state will notify the PIC and CEO of the proposed arrangements while offering an opportunity for consultation prior to the execution of such an agreement.

SDAs have always been encouraged to assist experience workers with additional barriers to employment. In PY'96, the Governor has identified and accepted the following barriers to employment for the Experienced Worker Program.

- deficient in basic skills;
- high school dropouts;
- recipients of cash welfare payments, including JOBS;
- offenders;
- individuals with disabilities;
- individuals who are homeless;
- recipients of food stamps;
- displaced homemakers;
- single parents with dependent child(ren);
- family members in AFDC or other public assistance household;
- dislocated worker;
- veterans;
- individuals who have a documented chronic medical condition and are under the care of a physician;
- minority;
- individuals with outdated skills;
- individuals who do not have access to dependable transportation.

The Division will continue to encourage state and local coordination activities. The Division has linkages with the Divisions of Aging, Employment Security, Older Americans Act Title V operators, and other workforce development agencies offering services to older individuals. JDT expects to expand employment opportunities for its older participants by networking with those

agencies that provide employment services and share similar concerns for older individuals. For example, the EWP staff member serves on the Division of Aging, Senior Employment Coordinating Committee, to increase program coordination, exchange program information and staff training resources.

State Education and Coordination Grant (8%) Funds

In PY'96, in accordance with Section 123(a), the Governor annually allocates 8% of Title II-A and Title II-C to the state education agency - the Department of Elementary and Secondary Education (DESE) - the funds made available to carry out this section under Sections 202(c)(1)(C) and 262(c)(1)(C) to pay the federal share of carrying out the section requirements.

The state education agency (DESE), in accordance with Section 123(c), has submitted a description of project goals to be achieved and services to be provided for school-to-work transition programs, literacy and lifelong learning programs, and nontraditional employment for women programs. The program description is jointly developed by DESE and the Governor.

The agreement shall be the Title II-A 8% agreement issued, or any amendments thereto, for the fiscal year. The agreement requires DESE to provide match equal to all Title II-A and Title II-C 8% funds provided under JTPA Section 123(a).

Attachment C is the plan jointly developed by DESE and the Governor. This attachment describes the projects to be funded and provides all specific information required in Section 123(c).

The Department of Elementary and Secondary Education, operating as the state education agency under this funding, will enter into agreements with each SDA and other entities such as other state agencies, community-based organizations, and local interagency teams, as appropriate. Agreements where 80% funds are used within the SDA will be specific to the projects funded.

Not less than 80% of the 8% funds allocated under Section 123(a) shall be expended to pay for the federal share of projects conducted in accordance with subparagraphs (A), (B), and (C) of subsection (a)(2) and shall meet the state match requirements.

The Department of Elementary and Secondary Education uses 20% of the funds allocated under Section 123 for the purpose of coordinating school-to-work, literacy and lifelong learning, and nontraditional employment for women programs funded with 80% funds. Specifically, DESE coordinates with JDT and the Missouri Women's Council among other agencies to enhance training

and educational services. DESE will provide other valuable services to enhance coordination between education and JTPA Titles II and III.

In accordance with Section 123(d)(2)(C), not less than 75% of the funds allocated for school-to-work, literacy and lifelong learning, and nontraditional employment for women will be expended for activities for economically disadvantaged individuals who experience barriers to employment. Programs funded under Section 123 will use the barriers identified in Sections 203(b) and 263(b) and (d).

Additional barriers identified by SDAs under Sections 203(d) and 263(h) will be incorporated into agreements required by Section 123(b) where JTPA 8% funds are used. Priority will be given to non-economically disadvantaged persons with barriers to employment, and/or Title III participants, in the expenditure of any balance of the 8% funds described above not to exceed twenty-five percent (25%).

The state performance goals will be incorporated into the individual project descriptions and will be evaluated periodically.

Capacity Building

The Division, in coordination with other partners, plan to use the JTPA funds earmarked for capacity building and technical assistance at the state level to continue support of the Missouri Training Institute. The Missouri Training Institute will continue to meet a variety of training and development needs for the Missouri workforce development system. Professional staff development and other capacity building is provided in a close working environment with staff and management of JDT, AEs, PICs, local program operators, and other state agency partners.

The state will continue to provide technical assistance directly or by procuring training consultants to work with one or more SDAs as the need dictates. The Missouri Training Institute works closely in coordination with JDT to provide preventative technical assistance as well as professional staff development and other capacity building. Staff training is jointly designed and financially supported by the state agency partners and SDAs to provide more timely technical assistance to the SDAs on regulatory issues as well as information sharing of best practices.

Cross-training, particularly with the Division of Employment Security and the Division of Family Services, is provided by the Missouri Training Institute, JDT, and others. This has enhanced the coordination and cooperation among the state and local service providers as the One-Stop Career Center system evolves.

In an effort to increase broader local staff participation in capacity building, the SDA may earmark a portion of its incentive grant and/or expend formula funds for staff training. Each SDA will include a description of any local technical assistance and/or capacity building in its job training plan. These activities must complement statewide capacity building and/or technical assistance strategies.

The state has an issuance system to communicate JTPA policy decisions and pertinent information to SDAs which assists in the development and implementation of programs and plans. Topics have included sharing pertinent state and federally issued information on the JOBS program, customer satisfaction process, and an update on regional treatment centers where drug information and rehabilitation services can be obtained.

The state has issued planning guidelines to SDAs to assist in the development of their local Job Training Plans.

SDAs are also provided statewide and local information regarding social and economic characteristics, occupational and industrial characteristics, and labor market conditions. The state will continue to develop information on industries losing or gaining employment and industries expanding their work forces. Occupational projections to 2000 have been developed for the state, St. Louis Standard Metropolitan Statistical Area (SMSA), and Kansas City SMSA. Projections for the remaining SDAs were published in PY'95.

These projections identify occupations in demand as well as other occupational information. The Division, working with the State Data Center, the Missouri Occupational Information Coordinating Committee, and the Division of Employment Security, provides SDAs with a variety of publications, newsletters, and data reports on a variety of labor market issues. Special requests for sub-SDA data analysis can also be provided.

JDT has established a field representative system to provide ongoing technical assistance in planning and implementing JTPA programs. Three (3) full-time staff members serve as liaisons between their assigned SDAs and JDT. They provide guidance to PICs and AEs to assist them in carrying out the roles and responsibilities in providing services to their customers. Other JDT staff provide training or technical assistance to the SDAs and other agencies when appropriate.

The state provides individual orientation sessions to PICs upon request and provides a training session at MTEC's Annual Governor's Job Training Conference. JDT's Field Services staff, in conjunction with MTI, also provide two JTPA orientation sessions per year which are open to PIC members. The Division requires all SDAs to develop and implement a PIC orientation manual for members.

The state will continue to provide in-service training through its field representatives, operations staff, and the Missouri Training Institute. In addition, the state convenes regular meetings of the SDAs' AE Directors and their staff to provide in-service training and discuss issues of concern.

Incentive

The incentive methodology is provided in Attachment E.

Title V

Missouri does not participate in the Title V JEDI (Jobs for Employable Dependent Individuals) program.

IV. PERFORMANCE STANDARDS

Methodology Adjustment

Missouri plans to use the U.S. Department of Labor's (U.S. DOL's) national adjustment models to adjust SDA performance standards. Planned performance standards are calculated from data submitted in the SDA Job Training Plans state data provided by U.S. DOL, and local economic data.

Missouri plans to use the following standards for PY'96 and PY'97:

- Youth Entered Employment Rate
- Youth Employability Enhancement Rate
- Adult Follow-Up Employment Rate
- Adult Follow-Up Weekly Earnings
- Adult Welfare Follow-Up Weekly Earnings
- Adult Welfare Follow-Up Entered Employment Rate

Regional adjustments may be made on Title II-A and Title II-C standards at the Governor's option. Advanced copies of the JTPA Title II-A and Title II-C performance standards calculation worksheets and instructions were provided to the SDAs. Updated regional adjustment factors have not yet been forwarded from U.S. DOL.

At the end of the year, final performance standards are calculated for each SDA. End-of-year terminee (participant) characteristics and updated economic data are used in the U.S. DOL model. The average unemployment for the period of April, 1995 through March, 1996 will be used for PY'96; and April, 1996 through March, 1997 for PY'97. Actual performance levels are compared to these final performance standards to determine which SDAs will be eligible for incentive grants and which will be in need of technical assistance. An SDA may appeal any model adjusted standard that is an extreme value. Appeals will be considered for standards that have been derived using two or more extreme factor values.

The state has a technical assistance policy in place for SDAs who do not meet their minimum Title II-A and Title II-C performance standards. It may include:

- technical assistance from any JDT section in all aspects of the performance standards. Such consultations/visits may include PIC members, SDA staff (including subcontractors), and administrators;
- ongoing technical assistance by Field Services staff to include the PIC and local administrators;
- a written corrective action plan by the SDA;
- continuous monitoring, including monthly updated performance standards reports and ongoing technical assistance throughout the program year. The SDA will be alerted to potential problems and advised as to remedial actions.

Failure to attain a minimum of four (4) U.S. DOL performance standards or at least one youth performance standard at the end of any two consecutive program years will result in the imposition of JDT's performance standards sanction policy and authority for remedy pursuant to Section 106 of the Act.

Such remedies may include restructure of the PIC, prohibiting the use of designated service providers or other changes as the Governor deems necessary to improve performance including the selection of an alternate entity to administer the program for the SDA. The alternate Administrative Entity may be a newly formed PIC or any agency jointly selected by the Governor and the Chief Elected Official (CEO) of the largest unit of general local government in the SDA.

Any reorganization plans made in accordance with the performance standards sanction policy shall be made with full opportunity for a hearing. The hearing must be requested within 10 days of the receipt of the Governor's reorganization plan. A hearing will be held within 30 days of filing and written notification of the hearing determination issued within 60 days.

Upon receipt of the Governor's written notification that the hearing determination upheld the Governor's imposition of a reorganization plan, an SDA will have the right to appeal to the Secretary of Labor. Appeals must be submitted jointly by the PIC and CEO(s) of the SDA. The Secretary will accept appeals dated no later than 30 days after the SDA's receipt of the Governor's written notification of the hearing determination. A copy of the appeal must be simultaneously mailed to JDT when filed. The Secretary shall make a decision within 60 days of the date of appeal.

Sanctions will be imposed through a sanction letter signed by the director of JDT. Sanction letters will be mailed to the chairperson of the PIC, the CEO(s) and the SDA Director. Corrective action plans which are developed in response to a sanction must contain the signature of all three of these individuals. Sanctions will be removed only through a letter signed by the Director of JDT.

In addition to the six core national standards under Title II, there are also two standards mandated by U.S. DOL for the older worker program. The following performance standards apply to Missouri's Experienced Worker Program (EWP) and will not be factored into the performance standards sanction policy:

- Entered Employment Rate; and
- Average Hourly Wage at Placement.

NOTE: Programs operated under Section 204(d) are state programs even though they may be operated by various local entities. Therefore, performance standards will be applied to the total statewide EWP.

No additional data on EWP performance is currently available to assist in setting national standards. However, the Job Training Quarterly Survey (JTQS) has detailed employment and wage data on older workers served by regular Title II-A programs. Based on this data and adjusting for the 20 hours per week employment requirement, the Secretary has set national standards.

V. PROCUREMENT

The Division assured its procurement system was amended to comply with the Amendments and Final Regulations for implementation by July 1, 1993, specifically Section 164. It included the following:

- standards to ensure fiscal accountability to prevent waste, fraud, and abuse;

- a written code of standards of conduct governing the performance of persons engaged in the award and administration of JTPA contracts and subgrants;
- written procedures for procurement transactions which include all nine items listed under JTPA Section 164(a)(3);
- procedures for handling and resolving disputes relating to procurement at both the subrecipient and state level; and
- standards for JTPA entities to follow in making determinations of demonstrated performance prior to award.

These procedures were disseminated to SDAs and other subrecipients through the Division's issuance procedure and technical assistance system.

The Division continues to review and refine its programmatic financial and administrative policies to provide greater integrity to the entire JTPA system without circumventing the local PICs' authority.

The Division and/or the SDA monitors contractors and job sites for compliance with federal laws and regulations including compliance with procurement policies and requires corrective action when necessary. The Division certifies that compliance to the Secretary. The Division has implemented procedures which require corrective action for noncompliance with JTPA Section 164(a)(3) and will impose sanctions for failure to take corrective action as stated in Section 164(a)(5)(A) and (B).

The state has adequate methods of administration to assure compliance with Section 167 of the Act through ongoing monitoring, site visits, and technical assistance.

Special Services Activities

Missouri Youth Service and Conservation Corps

The Missouri Youth Service and Conservation Corps (MYSCC) combines community service and conservation promotion with work experience, training, and educational activities for participating Missouri youth. A preference for enrollment into MYSCC is given to high school dropouts and those determined to be at risk of dropping out of school. Through MYSCC participation, young people gain skills through subsidized employment which are transferrable to unsubsidized employment, as well as, post-secondary education opportunities.

The state is developing enhanced post-service benefits for young Missourians who successfully complete MYSCC activity. In a cooperative effort with the Missouri Division of Employment Security (DES), MYSCC participants will

qualify for an interview with a "Show-Me" employer who has a relationship with DES developed through Wagner-Peyser activity.

Added emphasis is being placed on MYSCC support of the continuing education for participants during and after the Corps experience. Eligible applicants for projects funded with JTPA Title II-A (8%) beginning in June, 1993 were encouraged to include post-service tuition vouchers to be awarded to corps members who obtained General Education Development (GED) certification while enrolled in MYSCC.

The state will continue this focus on education as a required feature of MYSCC projects through a grant from the federal Corporation for National and Community Service for assistance in recovery efforts from the flood of 1993. Each approved award will budget a minimum of 10 percent (10%) toward educational vouchers to be used as a post-service benefit for successful participants completing the program .

Title II-A (8%) funding will be used to fund MYSCC activity as a complement to the funding from the Corporation, other monies which will be sought under the National and Community Service Trust Act of 1993 from both federal agencies and the Missouri Community Service Commission. The 8% funds may also be used in combination with potential funding from the U.S. Department of Housing and Urban Development for Youthbuild activity.

Each Title II-A (8%) funded MYSCC project and component will feature educational opportunities, particularly for economically and educationally disadvantaged young people, with post-service benefits in employment and continuing education opportunities.

Funding for MYSCC activity ranges from federal resources, including JTPA, to contributions from the Departments of Conservation and the Department of Natural Resources, other local sources, and private contributions.

FUTURE YOUTH PROGRAM ACTIVITY

The state has one successful "non-JTPA" model for workforce development services focused on youth, the Missouri Youth Service and Conservation Corps (MYSCC). While MYSCC is capable of becoming the "flagship" for state sponsored youth programs, expansion of the corps in its current format to provide all youth with workforce development activities is not recommended. However, one of the keys to MYSCC's success has been the customer driven focus of the program and the flexibility of activities.

However, MYSCC is sometimes limited in the type of youth it can serve due to its labor intensive nature. First, youth below 18 are governed by child labor laws which limit the type of work they can legally perform. While MYSCC can include youth from age 16, child labor laws essentially eliminate their ability to work in a labor intensive program.

Secondly, not all young persons (regardless of age) are prepared to enter what is often the equivalent of a full-time job.

The state plans the continued expansion of the MYSCC model using funding from private sector contributors and other local sources to encourage customer designed projects. Also, an increased emphasis on coordination with the School-to-Work Opportunities Act to provide work-based, school-based and connecting activities is also being planned. The funding will also be tied to projects that address local needs identified by the interagency team which are spearheading the local One-Stop Career Center system effort.

Missouri Veterans' Employment and Training Program

Missouri is one of 14 states selected by the U.S. Department of Labor (U.S. DOL) through a competitive procurement process, to deliver JTPA Title IV-C funded employment and training activities which are exclusive for eligible veterans of the U.S. armed services. The primary focus of the Missouri Veterans' Employment and Training Program continues to be the provision of services to veterans with barriers to re-employment.

Missouri received \$475,000 from Title IV-C funding for PY'95. Coupled with \$198,590 contributed from participating local JTPA Private Industry Councils in Service Delivery Areas 3, 6, 12, and 13, a total of \$673,590 is dedicated to the training needs of eligible veterans. The planned performance expectations for this funding level is to enroll a minimum of 156 veterans, with no less than 75 percent (75%) of program completers entering unsubsidized employment at an average wage of \$7.84 per hour.

Program services are available to veterans who meet any one of the three eligibility criteria: 1) veterans of the Vietnam era; 2) service-connected disability; or 3) recently separated (within the past 48 months) from military service. Within these eligibility groups, Missouri's Title IV-C program has placed an emphasis on the enrollment of women; the homeless; offenders; Native and African Americans; and Vietnam Theater veterans.

The Division provides overall planning, management, oversight, reporting, and administration for Title IV-C activities which are delivered in the St. Louis and Kansas City metro areas, but available to veterans from all parts of the state.

Every participating veteran is enrolled in at least one of the two available "core" training activities--on-the-job training, or classroom training--dependent on the need of the individual participant. As part of an intensive case management approach to delivery of comprehensive program services, Missouri's Title IV-C efforts include an objective assessment of employability strengths and weaknesses, counseling, and job search assistance in combination with core activities to improve the opportunity for the transition into unsubsidized employment.

Pending continued funding from the U.S. Department of Labor, the Division anticipates the availability of a Title IV-C funding for PY'96 equal to or greater than the amount awarded for PY'95. Program activity will continue at the current, or an increased level dependent upon the PY'96 Title IV-C award.

Mandatory Employment and Training Programs

The state continues to provide JTPA services to those Missourians considered to be "most in need". While the state targets service to recipients of Aid to Families with Dependent Children (AFDC) with JTPA funding, additional avenues are accessed to assist in providing service to other hard-to-serve demographic categories.

Through contractual agreements with the Missouri Division of Family Services (DFS), and the U.S. Department of Agriculture (USDA), funds are made available to enhance accessibility to employment and training services for Mandatory Employment and Training Program (METP) eligible Food Stamp recipients. Participating local JTPA Administrative Entities offer METP clientele an array of services which may include on-the-job training, classroom-occupational training, work experience, and job search assistance.

During PY'96, DFS is making available \$250,000 to provide the expanded employment and training services available to METP clientele. The performance expectation is a statewide enrollment above 1,000 persons identified as METP eligible. Participating SDAs are: 1, 2, 3, 4, 5, 9, 10, 12, and 14.

MTEC Interagency Team

In 1991, the Missouri General Assembly created the Missouri Training and Employment Council. The enabling legislation mandated the development of a policy and plan to prepare Missouri's work force to compete in the evolving global economy.

The Missouri Training and Employment Council appointed the Workforce Preparation Task Force to complete the two specific mandates. The Policy was completed in 1992, and the plan in 1993. It was presented and adopted by the Council in December 1993. The Plan has been endorsed by each major state agency in the workforce development system. The Governor endorsed the plan and issued Executive Order 95-11 in May, 1995 to establish an interagency team representing the Departments of Economic Development, Elementary and Secondary Education, Higher Education, Labor and Industrial Relations, and Social Services to implement the statewide workforce development plan based upon the recommendations of the Missouri Training and Employment Council (MTEC).

This interagency team has met regularly to focus on the development of new joint programs and better communication. The development of the emerging One-Stop Career Center systems and new approaches for more efficient service delivery to all customers have been major group topics.

The Plan calls for several interagency work groups to be established to research and, if necessary, to propose legislation to facilitate the development of:

- compatible data base to serve the employment and training system;
- streamline intake and assessment systems;
- identify retraining needs;
- involve business community to work collaboratively with education in the planning, operation, and evaluation of training programs;
- establish uniform skill standards for vocational and technical training; and
- promote the use of apprenticeship programs for both adults and youth.

In early 1994, the Council began the implementation process by identifying the tasks for four interagency work groups and the process to get them established. The areas of concentration for the work groups are streamlining the intake and assessment process; development of strategies to provide earlier access to information and quality retraining for laid off workers; and collaborative involvement of the business community in the planning, operation and evaluation of training programs. This is the beginning of the coordinated approach for the preparation of Missouri's work force.

At MTEC's direction, an interagency workgroup was appointed in mid-1995, to identify data elements which could be shared in order to streamline the intake/assessment process. The workgroup combined with a data sharing workgroup established for the One-Stop initiative in late 1995 and has identified all data elements. Currently, a technical workgroup including users

are meeting bi-monthly to determine equipment and related electronic needs to facilitate the shared data.

The MTEC Customer Focus Team merged in December 1995 with the One-Stop Customer Focus Team to develop and oversee the implementation of a customer focus continuous improvement model. This project is being designed and will be implemented to meet the needs of customers and the workforce development system.

This continuous improvement model employs a holistic approach to effectively set goals and improve the effective delivery of services.

The three major components of this model are:

- statewide customer feedback system;
- state-level outcome measures; and
- state-level support to local agencies through capacity building and technical assistance.

The team is coordinating with the One-Stop capacity building team to ensure local agencies receive support through customer focus training and is currently outlining the framework for the overall continuous improvement model.

The MTEC Workforce Plan outlines several areas of concentration requiring attention to realize it's vision of a world class workforce development system. The One-Stop initiation is compatible with those plan goals.

The One-Stop Career Center System will provide access to labor market, career counseling and information about job openings, referrals and placements. Missouri will provide information and services through an automated information access system provided at local sites. The goal of the One-Stop Career Center system is to integrate the state and local delivery of education, training and employment services. By integrating programs such as the MISSOURI WORKS initiative with Work Connections, opportunities will be expanded for all customers needing employment and training assistance or seeking skilled employees. The achievement of the Center's goal will allow workers and employers to make informed choices about their work lives and futures.

VI. ASSURANCES

JTPA Compliance with Section 167

The state has adequate methods of administration to assure compliance with Section 167 of the Act through ongoing monitoring, site visits, and technical assistance.

DEOBLIGATION AND REOBLIGATION POLICY

TITLE II-A AND TITLE II-C

Beginning July 1, 1994, each Service Delivery Area (SDA) Administrative Entity (AE) must obligate 85% of its Title II-A and 85% of its Title II-C formula allocated funds, including unexpended balances from prior program years, during the program year. Obligate includes the cost of orders placed, contracts awarded, goods and services received, and similar transactions during a specific funding period which requires payment by the AE or a subcontractor during the same or future funding period.

The Obligation Requirement shall be computed based on allocations net of any transfers made in accordance with JTPA Sections 206, 256, or 266.

An AE which does not obligate 85% of its funds as outlined above will have an amount equal to the amount of unobligated funds that exceeds 15% of its allocation deobligated from its next year's formula allocation. These funds will be reobligated to those AEs that met the 85% obligation requirement based on a formula to be developed by the Division of Job Development and Training. Funds are made available to SDAs which have the highest rates of unemployment for an extended period of time and those with the highest poverty rates.

PY'96 JTPA
TITLE II-A AND TITLE II-C
FUND ALLOCATION METHODOLOGY

Job Training Partnership Act (JTPA) funds were allocated to Service Delivery Areas (SDAs) in accordance with the formula specified in Sections 202 and 262, as amended.

The funding allocations released by the U.S. Department of Labor (U.S. DOL) are based on Missouri Title II-A and Title II-C allotments. The Title II-A estimated allotment is \$9,495,161 and the Title II-C estimated allotment is \$1,522,474.

Data sources are as follows:

- Population data was based on the 1990 Census.
- Unemployment and civilian labor force data was based on data provided by the Missouri Division of Employment Security (ES). The time period used for determining SDA annual averages was the same as that used by the U.S. Department of Labor when it allots funds to the States. This was the annual average based on the 12 month period of July 1994 through June 1995.
- Economically disadvantaged data was provided by U.S. DOL. The data was developed under a special contract in cooperation with the U.S. Census. This data was developed for each state at the county and local jurisdictional level. Title II-A fund allocations were developed using the total number of economically disadvantaged aged 22 through 72 in each SDA. Title II-C fund allocations used the total number of economically disadvantaged aged 16 through 21 in each SDA.

Funds were allocated through two major procedures. The first procedure was to use the original formula distribution as detailed in Section 202 for Title II-A and Section 262 for Title II-C. The second procedure was to apply the 90 percent hold-harmless provision in accordance with each Section in the 1992 Amendments to JTPA.

STEP I

The first step for allocating funds to the SDAs was:

- Seventy-seven percent (77%) of Title II-A funds were allocated. Eighty-two percent (82%) of Title II-C funds were allocated.

- These funds were each divided into thirds (77% of Title II-A funds were divided by three, and 82% of Title II-C funds were divided by three).
- The three parts to the allocation formula specified in Section 202 (Title II-A) and Section 262 (Title II-C) were then calculated utilizing the data previously listed. The procedure for this was:
 1. All county level labor force data was aggregated by the ES to create SDA level data. Unemployment rates were then calculated on each SDA using this data.
 2. Each SDA was analyzed to determine if it constituted an area of substantial unemployment (an area with an average rate of unemployment of at least 6.5%). This method parallels the method used by DOL in allocating funds to the states.

The Department of Labor first determined if a state was an Area of Substantial Unemployment. For those states which were not, DOL then determined ASUs at the substate level. The state of Missouri was not an ASU and, therefore, substate ASUs were designated.

For PY'96 SDAs 1, 2, 3, 4, 5, 7, 8, 9, 11, 12, 13, 14, and 15 did not qualify as an ASU. Sub-SDA ASUs were designated for these SDAs using procedures guided by the law and by DOL's method of allotting to the State. Sub-SDA ASUs were unable to be designated for SDAs 5 and 14.

The law defines an ASU in Section 4(3) as "...any area of sufficient size and scope to sustain programs under parts A and C of title II...and which has an average rate of unemployment of least 6.5% ...". Field Memorandum #133-84 from DOL provides further guidance. It indicates that when a state does not qualify in total as an ASU, all jurisdictions within the state should be examined with the view of designating as ASU's contiguous combinations of counties, cities, towns, townships, other minor civil divisions and/or census tracts (or enumeration districts). It also indicates that an ASU must have a population of at least 10,000. The following method was used based on this guidance:

- Census Tracts or Enumeration District level data on unemployment was calculated using the census-share methodology required by the Bureau of Labor Statistics. The census tract or enumeration district's share of SDA unemployment was applied to SDA unemployment data for the period of July 1994 to June 1995.

- Census Tracts or Enumeration Districts within the SDA were aggregated until a unit was obtained that was contiguous, had a population of greater than 10,000, and had an unemployment rate of at least 6.5%.
3. One-third of the Title II-A 77% funds were allocated to all ASUs. The number of unemployed persons in each ASU was divided by the total number of unemployed persons in all ASUs. This figure was then multiplied by the funds available. This same procedure was used with respect to one-third of the Title II-C 82% funds.
 4. One-third of Title II-A 77% funds were allocated to SDAs based on excess unemployment. This was also done with respect to one-third of Title II-C 82% funds. Excess unemployment is defined as the number that represents the number of unemployed individuals in excess of 4.5% of the civilian labor force in the SDA or ASU. This is in accordance with Sections 202(d)(1)(B) and 262(d)(1)(B) of JTPA as amended in 1992. The number in the civilian labor in each SDA or ASU was multiplied by 4.5%. The resulting number in each SDA or ASU was then subtracted from the actual number of unemployed in each SDA or ASU. This then became the excess number of unemployed. The ASU number of excess unemployed was higher for those SDAs which had designated ASUs. Therefore, the ASU excess was used. The excess number in each SDA or ASU was divided by the total excess number in the state (the sum of the SDA and ASU numbers). This figure was then multiplied by the funds available.
 5. One-third of Title II-A 77% funds were allocated to SDAs based on their relative share of economically disadvantaged adults ages 22 through 72. For Title II-C, one third of the 82% funds were allocated to SDAs based on their relative share of economically disadvantaged youth ages 16 through 21. The data provided by DOL for this factor was used in accordance with Sections 202(d)(1)(A) and 262(d)(1)(A).

STEP II

The second step for allocating funds to the SDAs required application of the hold-harmless in the 1992 JTPA amendments in Section 202(b)(2)(A) for Title II-A 77% and Section 262(b)(2)(A) for Title II-C 82%. The hold-harmless provision specifies that each SDA must receive a minimum of 90% of the average of its allocation percentage for the two preceding program year allocations. This allocation percentage is described as the relative share. The procedure to determine the relative share was:

1. PY'94 and PY'95 allocations for each SDA were added together and divided by two to determine the average two year allocation.

2. The average for each SDA was divided by the state average to determine the SDAs relative share.
3. This relative share was multiplied by .90 to determine the SDAs 90% of their relative share.
4. This figure was multiplied by the total amount of Title II-A funds available to the SDAs to derive the minimum level of funds for each SDA.

After determining each SDAs minimum level of funds, the following procedure was used to complete the final allocation.

1. The minimum amount for each SDA was compared to the amount allocated by the formula process described in Step I.
2. SDAs whose allocation in Step I was less than the minimum amount were brought up to the minimum amount.
3. The remaining SDAs were re-allocated funds by starting from Step I and going through the entire process again. The SDAs who were brought up to the minimum level (and the money they received) were excluded from this process. This last step yielded the final allocation of Title II-A and Title II-C funds.

PY'96 JTPA TITLE II-A 5% FUND ALLOCATION METHODOLOGY (Experienced Worker)

Title II-A 5% funds will be equitably allocated to all 15 SDAs based on a formula methodology. The formula methodology will take into account the relative share of the population of eligible older individuals age 55 and over residing in each SDA and the participation of such older individuals in the labor force.

PY'96 JTPA TITLE II-B FUND ALLOCATION METHODOLOGY

Job Training Partnership Act Title II-B funds were allocated to SDAs pursuant to Section 252(b) which requires the use of the Title II-C formula. The funding allotments released are based on a Missouri Title II-B estimated allotment of \$9,012,872. One hundred percent (100%) of the Title II-B funds is allocated to the SDAs.

TITLE II-A 8% PROGRAM PLAN

In accordance with Section 123(c), Governor's Plan Requirements, the Missouri Department of Elementary and Secondary Education (DESE), working jointly with the Division of Job Development and Training (JDT), has prepared the following services plan to fulfill the requirements for the use of 8% education coordination funds.

I. SCHOOL-TO-WORK TRANSITION PROGRAMS

The goals for school-to-work transition programs include but are not limited to:

- Provide youth with the necessary academic, career decision-making skills and knowledge for post high school employment and training;
- Increase the rate of graduation from high school and increase the rate at which dropouts return to school or an alternative education setting;
- Increase coordination with work site and/or exposure to work for youth via mentoring, volunteerism, exploration, work experience, or other means;
- Integrate the concepts of school-to-work transition into the school curriculum to include the development of programs and services which are available on a year-round basis;
- Develop partnerships with local private sector employers and use other community resources to meet the school-to-work transition needs of youth; and
- Develop youth apprenticeship type and/or Tech Prep pilot projects on a statewide basis.

A. Activities and Services

School-to-work transition programs funded under this section shall:

1. Result in increasing the number of youth staying in or returning to school and graduating from high school or the equivalent; and
2. Provide school-based, work-based and connecting activities consistent with the School-to-Work Opportunities Act.

Programs designed may include activities and services identified in Section 264(b) of the JTPA Act that will assist in meeting the goals identified above.

B. Work-Based Curriculum

School-to-Work projects funded under this section will use a work-based learning component which shall include as appropriate:

1. Work experience;
2. Work-based activities coordinated with learning in the school-based component;
3. Instruction in general workplace competencies; and
4. Broad instruction in all aspects of the industry.

Activities may include workplace mentoring work experience, job shadowing, paid work experience, or on-the-job training.

C. Career Path Employment

School-to-work projects will provide career path employment services such as career assessment, guidance and counseling, and other services which will assist the youth in identifying post-secondary education and employment opportunities. Such activities will be integral to the development of each participant's individual service strategy (ISS).

D. Integration

Where appropriate, projects will provide services to meet the school-to-work transition needs of youth in a way that prevents the duplication of services and delivery thereof by involving alternative service providers such as community-based and non-profit organizations in the planning of projects.

E. Linkages

School-to-work projects will establish linkages which reduce duplication and the need for JTPA resources by using other state and federal funding sources.

Particular emphasis will be made in coordinating 8% school-to-work projects with SDA funded Title II-C and Title II-B programs. Each program funded will be asked to establish linkages, where appropriate, with the programs cited in Section 123(c)(1)(E):

- i. Title II and Part B of Title IV;
- ii. the Elementary and Secondary Education Act (20 U.S.C. 2701 et seq.);

- iii. the Carl D. Perkins Vocational and Applied Technology Act (20 U.S.C. 2301 et seq.);
- iv. the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.);
- v. the Adult Education Act (20 U.S.C. 1201 et seq.);
- vi. the JOBS program;
- vii. The Stewart B. McKinney Homeless Assistance Act (Public Law 100-77; 101 Stat. 482); and
- viii. the National and Community Service Act of 1990 (42 U.S.C. 12501 et seq.).

II. LITERACY AND LIFELONG LEARNING

The goals to be achieved by literacy and lifelong learning programs include but are not limited to:

- Create greater access to education, labor market and career planning information, and resources;
- Promote SCANS competencies and foundation skills within adult literacy to develop lifelong learners;
- Support broad-based initiatives that will assist or provide Missouri employers and citizens with information and services to determine their literacy, occupational and skill needs, and/or deficiencies to better realize their full economic potential;
- Establish an environment for change in how agencies and individuals invest and re-invest in human capital for longer-term results;
- Encourage coordination across programs and agencies that promote the concepts of parents-as-teachers and family learning so that the family becomes the foundation in developing the concepts of literacy and lifelong learning;
- Promote the articulation of training programs for the sequential development of an individual's skills, thereby promoting lifelong education; and
- Develop youth apprenticeship type and/or Tech Prep pilot projects on a statewide basis.

A. Activities and Services

Literacy and lifelong learning programs funded under this section will use activities and services included in Sections 204 and 264 of the Act that will assist in meeting the goals identified above. Special emphasis will be placed on:

1. Literacy services, including GED preparation, tutoring, and living skills;
2. Literacy, skill, or other adult services for participants and employers;
3. Youth service and conservation corps education components; and
4. Support activities that allow adults to pursue further education and training.

B. Integration

Where appropriate, projects will provide services to meet the literacy and lifelong learning needs of youth and adults that prevent the duplication of services and delivery thereof by involving alternative service providers such as community-based organizations in the planning of projects.

C. Settings

Literacy and lifelong learning projects are anticipated in a variety of settings to include: schools, community buildings and agencies, shelters, and local employers.

D. Linkages

Literacy and lifelong learning programs funded under this section will be encouraged to establish linkages and coordination which reduce duplication. Collaboration is anticipated with existing programs, such as parents-as-teachers, FUTURES, School Age Child Care, Adult Education, Even Start, Apprenticeship, etc. Each program funded will be asked to establish linkages, where appropriate, with the programs cited in Section 123(C)(2)(D) of the Act.

- i. Title II and Title III;
- ii. the Adult Education Act;

- iii. the Carl D. Perkins Vocational and Applied Technology Act;
- iv. the Stewart B. McKinney Homeless Assistance Act;
- v. the JOBS program;
- vi. the Rehabilitation Act of 1973 (29 U.S.C. 701 et seq.);
- vii. the National Literacy Act of 1991 (Public Law 102-73);
- viii. the Emergency Immigration Education Act of 1984 (20 U.S.C. 3121 et seq.); and
- ix. the National and Community Service Act of 1990.

III. NON-TRADITIONAL TRAINING FOR WOMEN

The goals to be achieved and services to be provided by non-traditional employment for women programs include but are not limited to:

- Promote educational, training, and/or career enhancement opportunities for women;
- Identify and address obstacles women face in non-traditional occupations and incorporate potential solutions to those barriers in program design;
- Inform women of potential increases in earnings, benefits, job satisfaction, and job advancement when employed in a non-traditional field;
- Dispel myths and address prejudice about non-traditional fields for women by providing exploration and information to them; and
- Provide support to women in non-traditional careers which increase their self-esteem, awareness, and retention in programs via family support and long-term case management.

A. Activities

Non-traditional training programs for women funded under this section may include activities and services identified in Section 204 and 264.

These goals will be accomplished through a variety of services and activities that may include:

1. Career exploration, job shadowing, mentoring, guidance and counseling, and work experience;
2. Supportive services; and
3. Skill training and/or placement into on-the-job training in non-traditional fields.

Through the use of these activities, we hope to expose women to their full potential as well as provide the encouragement and support many women need to succeed in non-traditional fields.

B. Integration

Where appropriate, projects will provide services to meet the non-traditional training needs of women that prevent the duplication of services and delivery thereof by involving alternative service providers such as community-based and non-profit organizations in the planning of projects.

C. Linkages

Non-traditional employment for women programs will be encouraged to establish linkages which reduce the duplication and the need for JTPA resources by using other state and federal funding resources to include Carl D. Perkins Vocational and Applied Technology Act funds and services.

IV. PROPORTION OF FUNDS THAT WILL BE USED TO ACHIEVE THE GOALS

Not less than 80% of the funds allocated under Section 123(a) shall be expended to pay for the federal share of projects conducted in accordance with subparagraphs (A), (B), and (C) of subsection (a)(2).

V. SERVICE TO 14 AND 15 YEAR OLDS

In accordance with Section 628.315(f) of the Interim Final Regulations, services provided under Section 123 will be available to 14 and 15 year olds.

VI. BARRIERS TO EMPLOYMENT

In accordance with Section 123(d)(2)(C), not less than 75% of the funds allocated for school-to-work, literacy and lifelong learning, and non-traditional training for women will be expended for activities for economically disadvantaged individuals who experience barriers to employment. Programs funded under Section 123 will use the barriers identified in Sections 203(b) and 263(b) and (d). Additional barriers identified by SDAs under Sections 203(d) and 263(h) will be incorporated into agreements required by Section 123(b) where JTPA 8% funds are used.

VII. STATE EDUCATION AGENCY/SERVICE DELIVERY AREA AGREEMENTS

The Department of Elementary and Secondary Education, operating as the state education agency under this plan, will enter into agreements with each SDA and other entities such as other state agencies and community-based organizations, as appropriate. Agreements, where 80% funds are used within the SDA, will be specific to the projects funded.

VIII. COORDINATION OF SERVICES

The Department of Elementary and Secondary Education uses 20% of the funds allocated under Section 123 for the purpose of coordinating school-to-work, literacy and lifelong learning, and nontraditional employment for women programs funded with 80% funds. Specifically, DESE coordinates with JDT and the Missouri Women's Council, among other agencies, to enhance training and educational services. In addition, DESE will provide other valuable services which enhance coordination between education and JTPA Titles II and III.

SUBSTATE MONITORING PLANS

As required by the Job Training Reform Amendments (JTRA) of 1992, Service Delivery Areas (SDAs) and Substate Grantees (SSGs) must develop written Substate Monitoring Plans (SMPs) to effectively implement the oversight requirements described in Section 627.475 of the Job Training Partnership Act (JTPA), as amended. SDAs and SSGs are required to review the previously released U.S. Department of Labor (DOL) monitoring Technical Assistance Guide (TAG) in the development of SMPs. Although the TAG was written prior to the enactment of the JTRA, it contains many elements which describe an effective local monitoring system and quality controls.

The following are considered to be the minimum elements and standards to be complied with in the development and implementation of a Substate Monitoring Plan. All plans must be submitted with the SDA's Job Training Plan. The Substate Monitoring Plan must be in a manual format.

1. Identification of Who is to Perform the Oversight Function: The plan must address the organization [or position(s) if performed by the Administrative Entity (AE)] which will perform any monitoring activities. The SMP must demonstrate that the organization [or person(s)] has the ability and capacity to fully implement all required functions. Oversight systems must demonstrate use of monitors who have a separation of duties from the items being reviewed.
2. Identification of the Private Industry Council's (PICs) and Local Elected Official's (LEOs) Roles in Reviewing Oversight and Program Evaluation Information: The PIC has a statutory responsibility to ensure that JTPA-funded programs are properly administered. Periodic reports must be submitted to the PIC in order for them to make appropriate judgements.

The Division requires periodic monitoring reports to the PIC regarding service provider compliance with the terms and conditions of contractual scopes of work (including JTPA statutory and regulatory requirements). These same reporting requirements extend to all Administrative Entities which operate programs directly.

Also, subcontractor and SDA-wide performance reviews must be provided to the PIC periodically. In addition, programs must be periodically reported on regarding their overall quality focusing on the adequacy of: assessment, JTPA program activities and services, coordination with other agencies to meet the comprehensive needs of clients, and participant outcomes.

Inherent with the PIC's statutory requirement, is an assurance that when problems are identified, prompt and appropriate corrective action will be taken.

The Private Industry Council must ensure the above listed reporting systems function properly by way of reports to the full council or a standing committee.

Local Elected Officials may participate in this reporting/ review process in accordance with agreements developed with the Private Industry Council.

3. The SMP must be written and fully describe all aspects of the SDA's/SSG's monitoring system.
4. The SMP must be signed by the Director of the Administrative Entity, the PIC Chair and the Chief Local Elected Official.
5. The plan must demonstrate that the SDA/SSG's programmatic and operational oversight systems effectively regulate JTPA, as amended, as well as, JDT issuances.
6. SDAs must ensure that every brokered contractor performs on-site monitoring of OJT employers and other subcontractors to verify compliance with subcontract terms before making payments. Once initial compliance is established, a periodic payment structure may be established. SDA monitorings of brokered subcontractors must be conducted periodically to ensure on-going integrity. The monitoring of OJT employer records and training systems must be in full compliance with JDT standards at all times.
7. Non-brokered programs and services performed by the AE must be monitored at least annually, except where JDT's OJT monitoring requirements are stricter.
8. The SMP must describe (or include) the monitoring tools and instruments which will be utilized, how they will be utilized, and the frequency of their use.
9. The SMP must address the various procedures which will be utilized to ensure compliance with other (non-JTPA) federal laws and regulations (i.e., Fair Labor Standards Act).
10. The SMP must address the various oversight procedures which will be utilized to ensure that participants are provided quality services. The Division considers program quality as essential in achieving the goals of the Job Training Reform Amendments and substantive participant outcomes.

11. SDAs and SSGs must use random sampling techniques in participant file reviews to perform a documented test of current program year enrollee eligibility in every subcontractor and program which is operated. The following sample sizes are required at a minimum depending on the universe to be reviewed at an operator by program subpart (Title II-A, II-B, II-C) and Title:

<u>Universe</u>	<u>Sample Size</u>
1-200	51
201-300	55
301-400	58
401-500	60
501-1,000	63
1,001-1,500	65
1,501-2,000	65
2,001-5,000	67
5,001-10,000	67

This table is based on random sampling for attributes when the expected rate of occurrence is not over 20 percent with a confidence level of 90 percent, plus or minus 8 percent. SDAs and SSGs must retain written documentation concerning their test(s) of eligibility to include the individual participant files and sources reviewed.

12. Each SDA/SSG must perform a documented JTIS validation of current program year participant records at least annually. The validation must ensure that applicant and participant records have been entered in the JTIS and, conversely, that participants listed in JTIS have a complete file. A statistical sampling, using the above universes and sample sizes, must also be performed which reviews the accuracy of program activity and participant termination codes entered into JTIS. This sample must also include a full review of the accuracy of MOJT form completion and keypunching of information from MOJT forms into JTIS. At a minimum, the JTIS validation must be conducted at a time which will ensure a majority of participant files are reviewed during the course of a program year. SDAs and SSGs must retain written documentation of their JTIS validations, to include file count information which includes the files to be entered in JTIS as of the date of the validation, and the individual participant files sampled for accuracy of program activity/termination code entry in JTIS.
13. A description of the processes to be used for interviewing which includes participants, employers, trainers, operational and administrative staff. Documented interviewing for compliance and program quality must be performed on all brokered contracts. AEs which perform various functions internally may substitute documented reviews of the processes performed by staff when process reviews would be clearly more suitable and yield information of higher quality.

14. A description of the SDAs oversight system to ensure compliance with all equal opportunity provisions of the JTPA. The oversight system must encompass both the Administrative Entity and all subcontractors and include applicant outreach, applicant selection criteria, program enrollment criteria, participant outcomes, and agency hiring practices.

INCENTIVE AWARD POLICY

Missouri's incentive grant system will:

- Provide incentive grants to SDAs that exceed their minimum performance goals only if 65% of their participants meet the definition of hard-to-serve pursuant to Sections 203(b), 263(b) and (d);
- Set aside incentive funds for SDAs that demonstrate quality service to out-of-school youth;
- Consider the relative size of the SDA; and
- Provide incentive awards to SDAs for placing participants in employment that includes employer-assisted benefits.

The method to distribute incentive grants for PY'96 consists of the following steps:

- Step 1: A SDA will qualify for an incentive award only if the proportion of its total participants beyond objective assessment in Title II-A and Title II-C at the end of the program year is equal to or greater than 65% hard-to-serve as defined in Sections 203(b), 263 (b) and (d) of the JTPA. This constitutes a stand-alone eligibility criterion for an incentive award.
- Step 2: Eighty percent (80%) of the Title II-A and Title II-C incentive pool of funds will be allocated to the six (6) national standards.
- Step 3: Ten percent (10%) of the Title II-A and Title II-C incentive pool of funds will be allocated for model out-of-school programs with demonstrated records of success.
- Step 4: Ten percent (10%) of the Title II-A and Title II-C incentive pool of funds will be allocated to the employer-assisted benefits service level.
- Step 5: Calculate the maximum award available to an SDA on the national standards by multiplying 80% of the pool of funds by the percentage portion of Title II-A (77%) and Title II-C (82%) funds for all SDAs.
- Step 6: Divide the maximum award available to each SDA on the national standards by six (6) and assign one-sixth to each of the national standards in order to create separate reward pools for each standard.

Step 7: A SDA will qualify for a model out-of-school program award only if the proportion of its total youth participants in Title II-C at the end of the program year is equal to or greater than 50% out-of-school as defined in Section 263(F) of the amended JTPA, and pursuant to parts 628.803(A), (C)(2)(II), and (H), of the final rule. This constitutes a stand-alone criterion for 10% of the maximum award available to a SDA.

Step 8: Calculate the 10% maximum award available to an SDA on the Model out-of-school program award criteria.

Step 9: Performance meeting the model out-of-school program award criteria is excluded from the tiered system.

Step 10: Awards for meeting the model out-of-school program criteria will be determined in the following manner:

- For performance that meets the criteria, SDAs will receive 100% of the maximum award available for this factor.
- For performance that fails to meet the criteria, SDAs will receive no award for this factor.

NOTE: SEE THE OUT-OF-SCHOOL PROGRAM AWARD CRITERIA.

Step 11: Calculate the 10% maximum award available to a SDA on the employer-assisted benefits service level.

Step 12: Performance exceeding the employer-assisted benefits service level are excluded from the tiered system.

Step 13: Awards from the employer-assisted benefits service level will be determined in the following manner:

- For performance on the service level which is equal to or greater than the level, SDAs will receive 100% of the maximum award available for this factor.
- For performance on the service level which is less than the level, SDAs will receive no award for this factor.

NOTE: SEE THE CRITERIA FOR EMPLOYER-ASSISTED BENEFIT SERVICE LEVEL.

Step 14: Performance exceeding each of the six (6) national standards will be measured against tiers which correspond to performance ranges. The following performance ranges will be the tiered system:

- the 25th percentile will always be the standard.
- the 50th percentile will be the point above the standard where 50% of the SDAs exceed the standard based on national statistical samples.
- the 65th percentile will be the point above the standard where 35% of the SDAs exceed the standard based on national statistical samples.
- the 75th percentile will be the point above the standard where 25% of the SDAs exceed the standard based on national statistical samples.

Step 15: Awards from each of the six (6) separate reward pools will be determined in the following manner:

- For performance on a standard which is less than the standard, SDAs will receive no award.
- For performance on a standard which is equal to or greater than the 25th percentile and less than the 50th percentile, SDAs will receive 80% of the reward pool for that standard.
- For performance on a standard which is equal to or greater than the 50th percentile and less than the 65th percentile, SDAs will receive 90% of the reward pool for that standard.
- For performance on a standard which is equal to or greater than the 65th percentile and less than the 75th percentile, SDAs will receive 95% of the reward pool for that standard.
- For performance on a standard which is equal to or greater than the 75th percentile, SDAs will receive 100% of the reward pool for that standard.

- Step 16:** SDAs failing to achieve a performance equal to or greater than the 25th percentile on a minimum of four (4) of the six (6) national standards, including at least one youth stand, will be disqualified from an incentive grant.
- Step 17:** The balance of funds remaining after the distribution of funds based on performance on the national standards, the employer-assisted benefits service level, and the out-of-school criteria, will be distributed in the second round. The balance remaining from the employer-assisted benefits service level, and from the employer-assisted benefits service level, and out-of-school criteria is divided by six (6). One-sixth is added to every national standard. This is done for each SDA. The combined national, employer-assisted benefit and out-of-school criteria balance remaining is the total amount available for distribution in the second round.
- Step 18:** SDAs are excluded from awards on individual standards in the second round when they fail to meet or exceed
- Step 19:** Each qualifying SDA's performance on each national standard is adjusted for size by multiplying the percent exceed by the share of Title II-A (77%) and Title II-C (82%) funds received by the SDA in the second round. This yields a net performance.
- Step 20:** The net performance of qualifying SDAs is summed to a total for each standard. Each SDA's net performance on a standard is then divided by the total for the standard to determine the SDA's relative share of net performance.
- Step 21:** The total amount available for each standard is multiplied by the SDA's relative share of net performance to determine the SDA's second round award on individual standards.
- Step 22:** Each SDA's award on each individual standard is summed across the standards to yield the SDA's total second round award.
- Step 23:** Each SDA's first round award is summed with its second round award to obtain the SDA's final distribution.

CRITERIA FOR MODEL OUT-OF-SCHOOL YOUTH PROGRAMS

Ten percent of the incentive pool funds for Titles II-A and II-C will be allocated for programs with a demonstrated record of success in serving out-of-school youth. Missouri's criteria is designed to explicitly promote increased, quality service to this particularly hard-to-serve population. JTPA revisions require that for an SDA to receive consideration for such an award, they must first pass a "gate" in which not less than 50% of youth served must be out-of-school. Then, it must be determined whether or not specific programs have a "demonstrated record of success".

The following criteria will be used to determine if a program demonstrates quality to out-of-school youth:

- The criteria will consider innovative youth models having a positive impact on long-term earnings potential. Missouri encourages SDAs to pilot or replicate approaches that encompass ideas and strategies such as contextual learning and scans competencies which integrate occupational and basic skills while emphasizing those skills that are in demand or are projected to be in demand in the workplace. Specifically, the out-of-school programs that include any criteria such as the following will be awarded.

Program Criteria

Hands-on labor intensive activities such as: housing renovation, construction and/or weatherization; disaster relief; conservation/natural resource management; and/or, human service activities are combined with educational activities such as: GED classes; life/job skills; and, leadership training.

The promotion of activities that lead to the acquiring of skills such as allocating resources, acquiring and evaluating information, monitoring and correcting the performance of system, and applying technology to specific tasks, as well as other basic thinking and interpersonal skills.

Vocational-oriented, basic skills are weaved into job training.

Personal work traits and employability skills are enhanced through pre-employment/work maturity training.

Instruction contains work-based learning objectives.

Job specific skills such as computer assembly, architecture, air conditioning and heating, retail sales, and food service, are taught.

This broad approach allows any SDA that meets the initial 50% gate to receive an award, and points the SDAs in the direction of modeling their out-of-school programs after youth models that have shown more success in improving the long-term earnings potential of this hard-to-serve population. SDAs are encouraged to focus on program content, as well increased service to out-of-school youth. Programs that encompass ideas and strategies such as contextual learning and the scans skills are strongly encouraged.

CRITERIA FOR PLACEMENTS IN EMPLOYMENT PROVIDING EMPLOYER ASSISTED BENEFITS

The Performance Standards require that states develop a Title II-A and II-C 5% incentive policy to award placement of participants in employment providing employer-assisted benefits. Missouri will award 10% of the incentive pool of funds based on this criteria.

The definition for an employer-assisted benefit is detailed in the SPIR, i.e., it must consist of, at a minimum, health insurance benefits and coverage under Social Security or an equivalent pension plan. In the JTIS system this information can be captured on the MOJT-3 in Field 20, "fringe benefits". By definition, these would have to be terminations from training.

The Department of Labor (DOL) Guidelines provide that the state could determine a departure point or benchmark to sue in setting a reward level for benefits. The departure point would serve the same function served by the numerical national Performance Standards.

Bureau of Labor Statistics (BLS) Data: The BLS conducted a national survey of employee benefits in large, medium, and small employers in 1991-92. The results for large and medium employers were published in a report and are representative data for 36 million employees. The results for small employers were published in a separate report and are representative of 40.8 million employees.

The survey conducted of medium and large employers defined them as establishments employing 100 or more employees. Small employers were defined as establishments employing less than 100.

These reports contain data on the incidence of employees participating in some type of employee benefit plan. The data covers a range of different types of benefit plans: health insurance, pensions, paid holidays. It also aggregates that data for different

employee groups. Such data could be derived and adapted as a basis for a benchmark for employer-assisted benefits. The main weakness with this data is that it is based on a national survey sampling which may or may not be representative of local economic conditions.

The rationale is: The minimally acceptable level of placements in jobs providing employer-assisted benefits should be established at the proportion of incidence in the population of employees receiving benefits. In other words, SDAs should be minimally as good at placing participants in jobs with employer-assisted benefits as the participants would be if they obtained a job on their own in current economic conditions.

Since this means that the state is establishing a benchmark for placements, certain assumptions are built into the selection of a target figure:

- It is assumed that the largest number of placements in the Missouri JTPA system occur with small employers. This is assumed because the data suggest that the largest number of employers as well as the largest number of new jobs in Missouri occur with the employers who employ fewer than 100 employees. For this reason the incidence of employee benefits provided by small employers should be selected.
- It is assumed that the largest number of placements in the JTPA system will occur in service and production jobs. Sectors hiring these occupations have shown the greatest growth in new jobs. For this reason the incidence of employee benefits in these occupational groupings are likely to provide a better indicator of expected minimum performance.
- Since benefit plans vary widely even among small employers employing service and production jobs, some baseline indicator of the incidence of a range of benefits is needed. As indicated, Performance Standards regulations require that incentive awards be made for employer-assisted benefits consisting, of at a minimum, health insurance benefits and coverage under Social Security or equivalent pension plan. Employers may provide any of the above or none. The incidence of one category of benefits does not necessarily mean the others are provided by employers.
- It is assumed, for purposes of establishing a benchmark, that the incidence of a "medical care" as defined in the Bureau of Labor Statistics survey, is a predictor of a range of benefits provided by an employer and that it is a better predictor of pension benefits or other fringe benefits than other benefit plan incidences. In other words, a medical care benefit is more likely to predict the existence of a pension/Social Security than the other way around.

For these reasons, the recommended minimum benchmark is the BLS percentage for the incidence of "medical care" for full-time participating production and service employees in small private establishments. This percentage reported in the 1992 BLS report is 61%.

This would mean that 61% would be the minimum percentage of placements in jobs with employer-assisted benefits in order for an SDA to obtain a reward on this factor. In Missouri, attainment of this minimum would determine whether an SDA obtained 10% of its maximum award available.

STATE OF MISSOURI

**GOVERNOR'S COORDINATION AND
SPECIAL SERVICES PLAN**

PROGRAM YEARS 1996 AND 1997

SIGNATURE PAGE

A handwritten signature in cursive script, reading "Mel Carnahan".

Mel Carnahan, Governor

5-13-96

Date

CERTIFICATION REGARDING LOBBYING

CERTIFICATION FOR CONTRACTS, GRANTS, LOANS,
AND COOPERATIVE AGREEMENTS

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Division of Job Development and Training

FORMULA

Grantee/Contractor Organization

JTPA TITLE II/III PY 199

Program/Title

Julie Gibson, Director

Name and Title of Authorized Signatory

Signature

5/14/96

Date

*Note: In these instances, "All," in the Final Rule is expected to be clarified to show that it applies to covered contract/grant transactions over \$100,000 (per OMB).

Certification Regarding
Debarment, Suspension, and Other Responsibility Matters
Primary Covered Transactions

This certification is required by the regulations implementing Executive Order 12549, Debarment and Suspension, 29 CFR Part 98, Section 98.510, Participants' responsibilities. The regulations were published as Part VII of the May 26, 1988 Federal Register (pages 19160-19211).

(BEFORE SIGNING CERTIFICATION, READ ATTACHED INSTRUCTIONS WHICH
ARE AN INTEGRAL PART OF THE CERTIFICATION)

- (1) The prospective primary participant certifies to the best of its knowledge and belief, that it and its principals:
- (a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any Federal department or agency;
 - (b) Have not within a three-year period preceding this proposal been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State, or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
 - (c) Are not presently indicted for or otherwise criminally or civilly charged by a government entity (Federal, State, or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and
 - (d) Have not within a three-year period preceding this application/-proposal had one or more public transactions (Federal, State, or local) terminated for cause or default.
- (2) Where the prospective primary participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

Julie Gibson, Director

Name and Title of Authorized Representative

Signature

5/14/96

Date

CERTIFICATION REGARDING DRUG-FREE WORKPLACE REQUIREMENTS

This certification is being made in compliance with the Drug-Free Workplace Act of 1988.

- A. The State of Missouri certifies that it will or will continue to provide a drug-free workplace by:
- (a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
 - (b) Establishing an ongoing drug-free awareness program to inform employees about --
 - (1) the dangers of drug abuse in the workplace;
 - (2) the grantee's policy of maintaining a drug-free workplace;
 - (3) any available drug counseling, rehabilitation, and employee assistance programs; and
 - (4) the penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
 - (c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);
 - (d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will --
 - (1) abide by the terms of the statement; and
 - (2) notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
 - (e) Notifying the agency in writing within ten calendar days after receiving notice under subparagraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
 - (f) Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph (d)(2), with respect to any employee who is so convicted --

- (1) taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - (2) requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
- (g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e), and (f).

B. Place of Performance: This statewide certification will apply to any of the state's executive branch departments and all of the divisions and locations within these departments throughout the State of Missouri. The addresses of the offices of each department director are attached. Specific site location will be provided, as needed, with grant applications.

This certificate is for the period from October 1, 1994 through September 30, 1995.

This assurance is given in connection with any and all financial assistance from the Department of Labor after the date this form is signed. This includes payments after such date for financial assistance approved before such date. The applicant recognizes and agrees that any such assistance will be extended in reliance on the representations and agreements made in this assurance, and the United States shall have the right to seek judicial enforcement of this assurance. This assurance is binding on the applicant, its successors, transferees, and assignees, and on the authorized official, and is made in accordance with and to the extent of the authority of the undersigned.

State of Missouri:

9/19/94
Date

Del Corrahan
GOVERNOR

